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London WC2H 8DX



London Borough of Camden
Town Hall
Argyle Street
London WC1H 8EQ

By email

14 July 2021

Dear Sirs

Planning application ref 2021/2954/P
Proposed redevelopment of The Selkirk Building and West Central Street

I refer to the Application.

I invite the council to reject the Application in its present form, for the reasons set out below.

Introductory Comments

I make this submission as a resident of Queen Alexandra Mansions, Grape Street. My building would apparently become part of the boundary of the proposed demolition and reconstruction site, with the rear wall possibly becoming a party wall. Just as

importantly, local residents and businesses would be forced to endure the noise and vibration nuisance (as well as the dirt and dust and traffic disruption) of the demolition and construction period (which has, alarmingly, grown from 3 years (December 2020 zoom) to “approximately” four years in the space of just over 6 months).

My review of the Application and my ability to make submission on it have been hampered in a number of respects:

- ∞ The applicant's professional team have pursued a consistent policy of evasiveness when one has attempted to clarify matters. As a result, fundamental aspects of the proposal and, just as importantly, how and over what period of time they would be implemented, are unclear. This policy of opacity was made more explicable, if not more justifiable, in the light of the categorical statement by Jonathan Watson of Labtech at the zoom meeting on 15 April arranged by local community groups. Mr Watson made clear that Labtech had no intention of consulting with residents and the local community.
- ∞ In line with their consistent approach to avoiding transparency, Labtech have declined to make available hard copies of their application documents, suggesting that this is a responsibility of Camden, not of Labtech. They are also using Covid as a further excuse for non engagement. As recently as 9 July, Labtech's apologists were claiming that Covid restrictions prevent them sharing a physical model of the proposals;
- ∞ The Council has also been disappointing in failing to respond to questions going back to December 2020. Some of these relate to the applicability of Camden's own policies relevant to the application. There has, sadly, been a consistent pattern of Camden simply ignoring communications in relation to this project.

The combined lack of engagement or responsiveness by both Labtech and Camden makes it difficult for members of the public (Camden's Council Tax payers) properly to comment on and make representations in relation to the Application and may render the entire process open to challenge. I reserve my position on this point.

I am particularly concerned that I simply do not understand in any detailed manner Labtech's proposals for the siting, height and overall form of the new structures in West Central Street. These are the part of the proposed development closest to my home in Grape Street. They also form part of the complex overall project on which Labtech have refused to consult. I am told (although I could not find a mention on the Labtech website) the proposed structures proposed for West Central Street include a new electricity substation, which is potentially alarming in itself, given its proximity to residential blocks.

I have not yet had time to look at any documents relating to the construction management plan or the DMP. I am very concerned about the demolition and construction processes proposed should the application be granted, particularly as they are now expected to last “approximately” 4 years. I consider that, if the Council is minded to grant the application, one of the conditions should be a genuinely transparent and open minded three way dialogue between Labtech and its experts, the Council and affected local residents and businesses, so that we can, first of all, fully understand what is proposed, and then contribute to devising a process which reduces to an absolute minimum the noise, vibration and other disturbances and loss of amenity. Sadly, Labtech have already shown a cavalier approach to the amenity of local residents in the case of some unannounced (and I suspect unauthorised) “one off” interventions in West Central Street which have caused significant amounts of transmitted noise and vibration nuisance. Given this inconsiderate behaviour, it is essential that Labtech, if granted the privilege to carry out, and extract profit from, this major development, should be strictly controlled and monitored during the demolition and construction phases.

In the light of the unacceptable level of noise and vibration nuisance impact on Grape Street of the basement works being carried out by the Shaftesbury Theatre, I shall be particularly concerned if Labtech propose to carry out any pile driving, whether to support its proposed 80 metre tower block or otherwise.

It would be wholly unacceptable for the Council to allow Labtech to present to the community the sort of *fait accompli* which was imposed on (and over the heads of) Grape Street residents in connection with the previous plans for 9-13 Grape Street. In that instance we were only saved from mid air gantries, extended road closures and two years of noisy demolition and construction work and road closures by the sale of the property to a developer who had more sensible and proportionate proposals.

I will deal with my objections under a number of headings.

Overview

What is being proposed is a very major development, with a number of different components. Its realisation, over a period indicated (now- it has extended considerably since the information provided at the December 2020 zoom) to be “approximately four years” long, would be very intrusive and the 80 metre tower block proposed would also be extremely conspicuous and out of keeping with the area.

It takes courage to propose to build an 80 metre tower block over the post office railway tunnels which are underneath, but excluded from, Labtech’s title. I fear it also

takes a willingness (perhaps callousness is the correct word) to cause, over an extended period, an immense amount of noise and vibration nuisance as well as other inconveniences to those who live and work in the vicinity.

It may be impractical to reconcile what appear to be three overall objectives:

- ∞ The developer's desire and need to make a profit, having chosen to acquire a very complex site surrounded by busy streets, with little or no space for turning vehicles or storage of materials or skips;
- ∞ The architects' somewhat grandiose and unilateral vision to impose their preferred transformation of the area;
- ∞ The Council's interest in maximising CIL, so as to implement its proposed (but not adopted) Holborn Vision.

One is tempted to conclude that the 80 metre height now proposed for the tower block was arrived at by working backwards from the numbers required to achieve all three apparent objectives.

Consultation/ the SCI issued by London Communications on behalf of Labtech.

I have separately written to the Council with representations about the inadequacies of the consultation process.

Not only has there been no proper **consultation**; there has been no adequate **consideration** of the amenity and legitimate interests of those who would be affected by the Application, and of the environment of this sensitive site more generally, if the Application were to be implemented in its current form.

Labtech claims that they have been engaging with *stakeholders* since 2017. I assume that these unidentified stakeholders will have included the planning department at Camden. Despite this lengthy period of consultation and engagement, I understand that no pre-application advice has been issued by Camden, which seems strange. Presumably Camden must have made oral or email comments on the proposals discussed; indeed, the SCI refers to a number of minor modifications apparently introduced at the instance of Camden. Furthermore Labtech itself has at times claimed that the 80 metre tower block is imperative as being the only solution to its problems, precisely because of unspecified demands that Camden is making of Labtech. We have a right to know what these demands are or whether, like the Council's apparent blessing of Labtech's refusal to consult with the local community, a misrepresentation of the Council's position.

One gets the impression that Labtech's aversion to transparency may have infected Camden's own processes.

Labtech display a combination of arrogance and obstinacy, as well as a remarkable degree of confidence that the Application will be approved in a rubber stamp manner.

Labtech's advisers have informed me recently that the changes recorded in para 4.12 of the SCI were "mainly technical in nature". This, interestingly, contrasts with previous comments seeking to argue that these changes were evidence of Labtech being in listening mode.

Another recent comment which shows to what extent Labtech regard the planning review process for the Application as a *fait accompli* is "we are unable to fundamentally redesign the scheme at such a late stage of the design timeline".

In the light of this attitude on the part of Labtech and its team, it will be incumbent on Camden to show that the integrity and independence of the planning process can and will be assured.

The application is premature

Whilst it is open to Labtech to decide when it submits its Application, this should not be used as a method of avoiding transparency.

There are several reasons why the Application is currently premature:

- ∞ The lack of proper consultation already mentioned and the subject of a separate submission,
- ∞ more generally, the absence of a free flow of essential information,
- ∞ The lack of clarity on key facts. For example, if it is correct that Labtech have been consulting and engaging with "stakeholders" since 2017, it is extraordinary that up until very recently neither the Council nor Labtech seemed to have a clear appreciation of the exact amount of residential accommodation already in existence on the site,
- ∞ The opacity of the "subsidiary" proposals, for West Central Street and the New Oxford Street block.

Alternatives?

When one considers the substantial footprint of the Selkirk House block and then looks at the proposal for the 80 metre tower block, it is hard to avoid the conclusion that the proposal is perversely provocative.

If the volume of office space apparently needed by Labtech to make its proposal work were spread more evenly over the entire footprint of the space on the edge of the Bloomsbury Conservation area, and the curious "Vine Lane" proposal dropped, one might begin to have a design which is at least no more conspicuous and overbearing in height terms than the existing Travelodge. It is hard to imagine how Labtech came up with the current proposal as the "only" solution. Obviously it would help to have clarity of the demands which the Council is allegedly making of Labtech.

Because of the deliberate lack of consultation on the part of Labtech, it is impossible to know what alternatives Labtech has looked at since it started "consulting" in 2017.

Labtech have chosen to acquire a very difficult site, both because of its situation and because of the existence of the Post office railway tunnels underneath it. They have also chosen to make their own task of monetising their acquisition even more difficult by proposing to demolish the existing building (the bulk of which Labtech implicitly criticise) and to erect in its place an even taller, bulkier and more conspicuous 80 metre tower block. The engineering problems associated with the proposed 80 metre tower block must be formidable. Even the demolition in such a confined space will be difficult to execute unless Labtech has no concern for those who live and work in its immediate vicinity, as well as those who seek to use High Holborn and Museum Street as thoroughfares and, more generally, for the environment.

A less tall building might also have the advantage that the structural issues should be considerably less challenging.

Even with the limited information available, it is quite clear that, having regard in particular to the constraints caused by the existence of the post office railway tunnels (which are excluded from Labtech's title), the structural issues would be very complex. Experience of the extensive pile driving by the Shaftesbury Theatre has made residents very aware of the intolerable noise and vibration nuisance (and consequent headaches) this causes.

One of the many absurdities of these proposals is that Labtech seeks to criticise the existing Travelodge and at the same time to advocate the merits of its own much taller, bulkier and more prominent proposed tower block.

Labtech's approach is all the more disappointing when it has recent local experience of avoiding the need for demolition. Labtech purchased the trophy building close by on Bloomsbury Square which used to be the London home of the Liverpool Victoria Mutual Society and has (presumably successfully and profitably) converted the existing building to Labtech's own purposes.

The Council's Policies

The comments below are taken from policy documents found on Camden's website. Despite multiple requests, it has not been possible to clarify whether they are still the most up to date statements of (some of) Camden's applicable policies.

Paragraph 1.6 of Camden's policy document on Design states:

It is important that new developments respond positively to the historic environment in Camden to contribute to its sense of place

A site which is so close to one of Hawksmoor's masterpieces, only a little further away from the British Museum and which is partly located within the Bloomsbury Conservation area, requires scrupulous adherence to this principle. When one seeks to consider how Labtech's proposal meets this criterion, one is faced with a proposed structure with little to distinguish it from a visual perspective apart from its height and bulk, as well as its conspicuousness. One senses that Labtech is at least slightly embarrassed by it: the flier circulated by Labtech as part of its propaganda campaign is eloquent by omitting any image of the completed structure. Surely if Labtech were proud of this as a positive contribution to the historic environment, the artist's or cgi impression would figure prominently on the flier?

Paragraph 2.7 takes this principle further by stating explicitly:

The Council will not approve design which is inappropriate to its context or fails to improve the character of an area.

It is impossible to argue that a new and highly conspicuous 80 metre tower block would be appropriate to the edge of the Bloomsbury Conservation area or to a site which itself includes listed and historic buildings and is so close to St George's and the British Museum.

Paragraph 2.10 sets out some "principles of high-quality design"

∞ *Development should respond positively and sensitively to the existing context*

- ∞ *Development should integrate well with the existing character of a place, building and its surroundings.*

The proposed 80 metre tower block fails in all these requirements; there is no evidence of any sensitivity at all, or any attempt to integrate this out of scale tower block with the scale of the surrounding buildings; indeed, the proposed 80 metre tower block is not even appropriate to the historic and listed buildings on the rest of Labetch's own development site.

Paragraph 2.11 continues, talking of good design responding to the context by:

- ∞ *Ensuring the scale of the proposal overall integrates well with the surrounding area*
- ∞ *Carefully responding to the scale, massing and height of adjoining buildings, the general pattern of heights in the surrounding area*

One look at the cgi impression of the 80 metre tower block demonstrates that this requirement has not been met.

The Camden Planning guidance/ Design has a specific section on Tall Buildings.

There are a number of important and relevant policy statements, notably:

In 2.17:

How the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of the building affects the skyline

....

The historic context of the tall building's surroundings

2.20:

Key considerations relate to the integration of a building into its immediate context and impact on the public realm

2.22:

Furthermore, careful consideration should be given to the impact of a proposal on the sky view and skyline from the public realm

It is hard to see how the proposed 80 metre Tower block could meet these entirely sensible and rational policies.

The 80 metre tower block simply does not relate to its surroundings at all, except by overshadowing them.

It is evident that the top of the building would adversely affect the skyline, as is shown even from the limited cgi images made available by Labtech; the apologetic (and manifestly inaccurate) claim offered by Labtech's team, to the effect that the 80 metre tower block would be "invisible" from the British Museum is another illustration of Labtech's embarrassment as to the unsightly and out of character impact of the proposed 80 metre tower block.

The proposed 80 metre Tower block would be situated on the exact edge of the Bloomsbury Conservation area and would dominate and overshadow the southern edge. Labtech's site, taken as a whole, includes listed and historic buildings which would be at the feet of, and dwarfed by, the proposed 80 metre tower block. Despite the fact that part of Labtech's site contains listed properties, Labtech appears to have made no attempt to propose a unified whole with the new elements harmonising with the renovated buildings.

As for the historic context, apart from the conservation area itself and the individual listed buildings, St George's Bloomsbury is only yards away (but not even mentioned in the SCI) and the British Museum is at the top of Museum Street. The omission of St George's from the SCI shows how little attention that historic monument has received in terms of respect for the Council's planning policies.

I note the Camden policy document also refers to more technical aspects such as microclimates, wind turbulence and overshadowing. These are concerns, particularly bearing in mind that both West Central Street and Grape Street are already narrow streets. I have not had time to find out whether these issues are dealt with among Labtech's voluminous filings.

I understand that Labtech have been reluctant to carry out exercises which would illustrate in more detail the impact which the proposed 80 metre tower block would have on the overall environment and views from various sensitive points in the vicinity. This evidences the defensiveness of Labtech towards its controversial proposals.

I find it hard to believe that Camden could sanction a building of such a height in so sensitive a position. In this connection I note that the 2018 draft Holborn Vision document sets an aspiration for:

High quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and improving community safety.

It is not evident that the proposed development meets this proposed standard. Has this aspect of the draft Holborn Vision been abandoned by Camden?

I accept that the current building has no particular merit. I would also argue that it is out of proportion to its urban context and the conservation zone in which it stands. However, replacing one bulky stump with another, much taller and more conspicuous, one is not a basis for applying today's planning and environmental policy.

It is interesting to note that those undertaking the recent redevelopment of the adjacent Post Building (ex Royal Mail sorting site) limited their ambitions to a level which more or less fits in with the Commonwealth House Building. One is tempted to assume that planners have to date established as a maximum acceptable height in the area the peak of the LSE student accommodation on High Holborn. Judged by these standards, even the current Travelodge tower is excessive. A Tower of an even greater height and bulk must surely be out of the question.

The cgi image of the proposed Tower, as seen from the British Museum courtyard, demonstrates by itself how unsuitable and invasive the proposed 80 metre tower block would be. As already mentioned, I was troubled by the arrogant and dismissive way one of the developer's propagandists asserted that the proposed 80 metre tower block would not be noticed by visitors leaving the Museum. One might expect rather more compelling arguments to seek to justify this conspicuous protuberance. That said, the use of such an argument is telling in itself: the only way of justifying the proposed 80 metre Tower block is by pretending it isn't there.

In summary, Labtech's proposals breach numerous fundamental requirements of Camden's own design guidance.

For these reasons alone, the Council should reject the Application.

West Central Street Proposals

Such discussions as there have been to date have inevitably concentrated on the many issues surrounding the controversial 80 metre tower block proposed on the former Travelodge site, as well as attempting to dispel some of the inexplicable opacity as to the exact quantity of residential accommodation already in existence on the site. As a result, there has been very little exposition of the proposals for the West Central Street or New Oxford Street sites.

I am very concerned that I simply do not understand what is proposed in terms of new structures in West Central Street, and in particular:

- ∞ exactly where they would be sited by reference to the rear of Grape Street and the Old Fire Station apartment building;
- ∞ How tall they would be, both absolutely and by reference to adjoining buildings;
- ∞ Where the fenestration would be;
- ∞ What impact they would have on light to existing buildings in Grape Street and West Central Street;
- ∞ What use the proposed buildings would be put to;
- ∞ What the proposed buildings would look like;
- ∞ What would happen to the underground car park space immediately to the rear of Grape Street;
- ∞ Whether the entirety of the “approximately four year” period would be spent on the preparatory demolition work and construction of these structures;
- ∞ Confirmation that the vehicular access arrangements to West Central Street and Grape Street (from Museum Street) would not be disturbed or modified either during, or as result of, any of Labtech’s proposals.

Many of the answers to these fundamental questions would be provided if Labtech produced a physical 3 dimensional model of its proposals, as I have been requesting for months.

It may be that these proposals should be extracted from the Application and dealt with separately.

Specifications

I assume Camden will be reviewing the detailed technical proposals carefully, to ensure that the proposed 80 metre tower block would be Covid proof, in the sense of incorporating all the best state of the art ventilation and other measures, as well as increased lift access to reduce crowding within the building. It may be that some of the requisite best practice technical standards are still evolving, so as to justify a delay in consideration of the Application (assuming Camden considers that it is appropriate to allow erection of an 80 metre tower block in this sensitive position, dominating and overshadowing the Bloomsbury Conservation area).

It would be unfortunate (should the Application be granted) if the proposed 80 metre tower block were obsolete from the outset.

Demolition and Construction Issues

This is only a preliminary submission on this important aspect of Labtech's' proposal; time has not permitted me to review all Labtech's materials submitted in relation to this complex and controversial proposal.

The question of how Labtech's project would be carried out, and how long it would take, is a matter of considerable practical concern. The concerns extend to questions of cumulative impact recognised in Camden's policies, bearing in mind Camden's own West End project, the ongoing Shaftesbury Theatre project and the only recently completed project at 9-13 Grape Street. In addition, Thames Water are actively involved in emergency works in this part of Shaftesbury Avenue.

On zoom in December, we were told that the construction period (implying inconvenience and disturbance for local residents and businesses) would be 3 years. Yet the previously prepared marketing materials told of a period of 3.25 years. This number itself appeared to be qualified by the word "build", so presumably did not include preparation or perhaps even demolition. I was subsequently told that the period would be "approximately four years" but it remains somewhat unclear whether this covers all the demolition and construction phases.

Some transparency as to the entire time line would be welcome.

This discrepancy suggests a cavalier attitude to the inconvenience likely to be caused to local residents and businesses.

One particular issue which is of concern relates to any asbestos which may be present on site. The close proximity of residential accommodation (including the LSE hall of residence) makes it imperative that there would be no escape of asbestos fibres during the demolition and stripping out phases.

An opaque allusion was made during the December zoom presentation organised by Camden to some particular complexities of any redevelopment of the site. I do not know the full detail of this, but understand it has something to do with the presence of the old Post Office railway system running under the site, benefiting from a title reservation.

It would be useful to understand better:

- ∞ The nature of the problem;
- ∞ Whether additional consents will be required from the Post Office (or its successor) and the timing impact;
- ∞ What this means in terms of complexities of the demolition and rebuilding process;
- ∞ What is proposed in terms of demonstrating, before any works commence, that the method of working proposed is guaranteed to be effective;
- ∞ On what basis it is sensible, given these complexities, to propose construction of an 80 metre tower block;
- ∞ What risks there are of unexpected problems and concomitant delays once works begin.

I presume that the developer and the Council will have the benefit of learning from any issues encountered when the Post Building was redeveloped.

More generally, it would be useful to have more transparency about what works and temporary structures would be required in order to achieve the developer's objectives for the site (or sites).

Some important elements on which more information is required as a matter of priority include:

- ∞ What, if any, road closures are envisaged and for how long;
- ∞ Any phasing, given that there appear to be at least four different components;
- ∞ Proposed Working hours, to the extent that they depart from Camden's scheduled hours is proposed. In particular, confirmation is needed that there will be no night working;
- ∞ Proposed Vehicle movements and stopping locations and how this will be coordinated with other works in the area.

Construction Management Plan

I have not yet had time to review whatever draft materials were submitted with the Application relating to a prospective Construction Management Plan

Residents of Grape Street have recent experience of having foisted on them, with little or no opportunity for the meaningful consultation ostensibly required by Camden's published procedures, a wholly unreasonable and intrusive CMP for a project which happily never saw the light of day. If Labtech are allowed to take forward this project in any form, it will be essential that there is genuine consultation with, and consideration of the concerns and rights to amenity of, all local residents and businesses.

Specific issues for Grape Street Residents

My comments under this heading are limited by the paucity of information available about the secondary development proposed in West Central Street (which may or may not be designated Vine Lane).

As the Council will be aware, the street's residents and businesses are highly sensitive to ambitious or overweening development proposals in the vicinity, which receive approval despite the wholly foreseeable and highly adverse impact on local residents and businesses in terms of amenity and nuisance. Mercifully the 9-13 Grape Street project which the Council approved some years ago did not in the end see the light of day and common sense eventually prevailed, in the form of a more modest and suitable project.

Based on the information available to date, it seems that there are likely to be issues under the following headings:

- ∞ Reduction of light generally to buildings in Grape Street;
- ∞ More specific legal rights of light issues in particular cases;
- ∞ Shadow created by the proposed 80 metre tower block;
- ∞ loss of privacy from overlooking;
- ∞ fire and emergency escape issues for residents of Queen Alexandra Mansions;
- ∞ nuisance and congestion issues arising out of the demolition and construction methods and ("approximately four year") demolition and construction period.

In connection with the latter point, I would mention that we have had occasion over the last couple of years to discover quite how far through the ground the noise, and

especially vibration, from drilling and pile driving work travels. Even before Labtech has obtained any approvals, we have already been subjected to inconsiderate and cavalier one off noise and vibration nuisance issues caused by Labtech's contractors. Labtech evidently (and sadly) sees no need to cultivate the goodwill of these most affected by its proposals.

I should add that Museum Street and West Central Street are the only vehicular (including emergency) access to Grape Street now that the Council has introduced its West End Project.

In view of the particular concerns of Grape Street residents and businesses, it might make sense for the developer to arrange a specific consultation meeting (ideally not exclusively via zoom) with those affected in Grape Street. Residents of the development in West Central Street will have similar concerns.

The final point I would make which is specific to Grape Street is that there is a current example of businesses and residents accommodating, and adapting to, a reasonable development project undertaken by a responsible developer who has taken appropriate account of the legitimate concerns of those living or working in the street. It is to be hoped that Labtech will be inspired by that example.

Vine Lane

In many ways, this is the strangest component of this composite application.

First, it is not clear why Labtech, as a private sector developer, takes it upon itself to propose the creation of a pedestrian alleyway. This is all the more strange when the price of this alleyway is an 80 metre tower block.

If Labtech believes that the unspecified constraints (and requirements of the Council) under which it is operating give it no option but to propose an 80 metre tower block, yards away from St George's Bloomsbury and overlooking the Bloomsbury Conservation Area, surely it should have considered how much it could have reduced the height of its proposed tower block by eliminating the gratuitous alleyway (and spreading the bulk of its proposed new structure along the High Holborn frontage).

There is no information on the alternatives Labtech considered and dismissed before arriving at the purportedly inevitable 80 metre tower block.

I specifically object to the Vine Lane proposal because it is likely to attract antisocial activities. It is not clear what purpose it is intended to serve. Nor is it clear whether, for example, the views of the security services have been sought.

I believe it should be up to the public authorities to decide on the creation of new roads or passageways. The area has already been the subject of a major refashioning of roads and routes, in the form of the West End Project. "Vine Lane" was not part of that. If Camden thinks this is a good idea in itself, it should carry out a formal consultation and risk assessment on the topic.

The recent experience of Dunn's passage suggests that the proposal on the part of Labtech should be treated with extreme caution and that it cannot be regarded as an instance of enduring community benefit or planning gain. For the same reason, if "Vine Lane" is included in any measurement of "open spaces" resulting from the Labtech proposal, the measurement should, for review purposes, be adjusted to exclude any contribution from the Vine Lane proposal.

Absence of Cultural space

This site is, in part, within the Bloomsbury Conservation Area and it is close to the British Museum as well as to theatres and the Royal Opera House. It is noteworthy that Labtech want to erect an 80 metre tall office tower block but do not propose to offer any cultural space or facilities in the huge expansion of the floor space on the site which they are requesting to be allowed to create.

This is all the sadder since, as the Council will know, the British Museum had hoped to expand into space in what is now the Post Building, a project which had to be abandoned because of the austerity programme.

Interim Use of the site

In my letter to Camden on 29 December, I raised the question of interim use of the Travelodge and in particular the possibility of the temporary use of the building to house those on Camden's housing list, or others who are, for whatever reason, homeless. Alternatively, it might be used for key workers or as an overspill for the LSE hostel on the other side of the road.

We know that the top two storeys of the Travelodge building are residential accommodation, so perfectly suited to provide much needed accommodation.

Sadly, Labtech have allowed the Travelodge and the flats on the top two floors to remain empty. This suggests a lack of community spirit and, indeed, of imagination.

Economics

Camden will have information as to levels of office vacancy as well as of office space coming on stream in coming years, so that it can satisfy itself that there is a need of an 80 metre tall office tower block in this vicinity. I assume therefore Camden is satisfied that there is a demand for an office tower of the size and height proposed. I note that Labtech already owns other office buildings in the close vicinity and that one of these sites was being marketed recently as an “audacious” venture.

It may be that the economics are strictly a matter for the developer alone, but experience of the Post Building as well as of much smaller sites which become effectively blighted for long periods because of impractical or overambitious plans makes me concerned that we could have a repetition of this sort of blight, in an area which has a history as a hub for crime and antisocial behaviour. It is therefore important for an element of realism to be factored into the proposal.

Labtech operates through opaque offshore companies, so that it is hard for the public to make an informed assessment of its substance or its ability to deliver on the ambitious proposal which the Application represents. I trust that Camden will carry out some due diligence of its own on private financial information, to reduce the risk, if any version of the Application receives planning permission, of work commencing and then grinding to a halt once interest rates rise or other economic shocks push Labtech off course.

Role of Camden

Camden is of course the regulatory authority which is required (at least in the first instance) to consider the Application.

It is also evident:

- ∞ That Camden stands to be a significant financial beneficiary of any consent granted, by virtue of CIL;
- ∞ That Camden’s entirely separate Holborn Vision proposal (still apparently under consultation, although I am not aware of any invitation from Camden to local residents to make representations on it) is dependent on third party finance such as CIL.

I note that the amount of CIL was included by Labtech as a selling point in marketing materials.

In addition, we are told from time to time by Labtech's apologists that Camden has made unspecified demands of Labtech and that these have led to Labtech's coming up with its controversial proposal to build an 80 metre tall tower block overshadowing the Bloomsbury Conservation Area. It is important to understand what these demands are, on what they are based, and to what extent they might influence the process of considering the Application. It may be that these demands themselves are susceptible of challenge.

It will therefore be important to ensure that those considering the formal application do so in an entirely unbiassed manner and only to have regard to relevant and legitimate factors germane to planning decisions, including Camden's own published planning policies.

CIL is an incident of development, not an objective of it. Planning decisions should not be influenced by the existence or level of possible CIL.

There is the added complication in this case of Labtech and Camden sharing the services of an individual who is both a director of Labtech and a Camden Councillor. This makes it all the more vital for Camden to ensure that the Application is seen to be treated with complete objectivity as well as thoroughness. Given that the Applicant has been working on this since 2017, any decisions on the Application should not be rushed.

It would be useful to know what arrangements Camden propose to put in place to ensure the requisite independence of decision making on the Application.

Conclusion

The one thing which is very clear is that this is a highly controversial proposal. The proposed 80 metre tower block proposed is wholly unsuited to, and would damage, the historic environment in which it is proposed to be sited.

Too many important questions remain outstanding for the Application to be approved at this stage; it is hard to see how it can even be properly, fully and impartially considered, as Camden is obliged to do.

No one would regret the demise of the Travelodge tower, although there is bound to be scope for it to be refurbished and given a new skin. I expect that a number of those who are following this consultation are puzzled as to how the then developer got away with obtaining permission for its erection. Doubtless part of the reason relates to evolving tastes, but I hope also that there is today an enhanced sensitivity as to the impact of new, disproportionate and conspicuous structures on the existing Bloomsbury Conservation Area environment.

It would be unfortunate if, in 40 or so years' time, our successors were equally bemused as to how any even taller tower structure such as that proposed to replace the Travelodge tower could have got past the planners.

The site requires a carefully considered and architecturally significant building which respects its environment. The proposed 80 metre tower block does not meet those criteria. It does not even respect Camden's own basic published principles.

Next steps

As already indicated, a greater degree of transparency is called for, so that there is more substance on which to comment in a more focussed manner. It is nevertheless quite plain that this proposal is highly problematic in multiple respects.

I am sending this letter to David Fowler, as suggested by him. Feel free to circulate this letter among your other colleagues who are responsible for reviewing this proposal, as well as to the various firms of consultants advising the developer.

Please advise me if there are to be further consultations by Camden or (for the first time) by Labtech or any formal hearing on the application, as I should like to attend and have the opportunity to make oral representations.

Yours faithfully,

Peter Bloxham